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1 P.O. Box 188976 2 Sacramento, CA 95818 Tel: (916) 704-2665 3 timzindel@gmail.com 4 5 Attorney for Defendant 6 7 8 9 10 UNITED STATES OF AMERICA, 11 Plaintiff, 12 VS. 13 VICTOR MANUEL VELAZQUEZ, 14 Defendant. 15 16 17 18 19 20 21 22

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TIMOTHY ZINDEL, #158377

VICTOR MANUEL VELAZQUEZ

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

Case No. 2:21-CR-0109-DAD STIPULATION AND ORDER CONTINUING SENTENCING AND STATUS AND EXCLUDING TIME Judge: Hon. Dale A. Drozd Date: August 25, 2025 9:30 a.m. Time:

Defendants Victor Manuel Velazquez and Diana Cervantes, and plaintiff, United States of America, ask the Court to make the following orders re scheduling of these two defendants:

- 1. Sentencing as to Ms. Cervantes, which is now scheduled for August 25, 2025, may be continued to Thursday, August 28, 2025, at 9:30 a.m.
- 2. Sentencing memoranda concerning Ms. Cervantes shall be filed on or before August 21, 2025.
- 3. The status conference as to Mr. Velazquez, whose case is to be dismissed following sentencing of Ms. Cervantes, shall be continued from August 25, 2025, to August 28, 2025, at 9:30 a.m.

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| 1  | 4. Mr. Velazquez and the government agree that time under the Speedy Trial Act, which    |  |
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| 2  | has been excluded through August 25, may continue to be excluded through August          |  |
| 3  | 28, 2025, for reasons noted in the stipulation filed May 30, 2025 (ECF 312) and to       |  |
| 4  | afford the parties time to effectuate their expected resolution of the case. The parties |  |
| 5  | agree that the interests of justice to be served by this continuance outweigh the best   |  |
| 6  | interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. §     |  |
| 7  | 3161(h)(7)(A) and (B)(iv   | v).  |
| 8  |  | Respectfully Submitted,                          |
| 9  | Dated: August 15, 2025   | /s/ T. Zindel TIMOTHY ZINDEL                     |
| 11 |  | Attorney for VICTOR MANUEL VELAZQUEZ             |
| 12 | Dated: August 15, 2025   | /s/ T. Zindel for T. Warriner                    |
| 13 |  | TIMOTHY E. WARRINER Attorney for DIANA CERVANTES |
| 14 |  | ERIC GRANT                                       |
| 15 |  | United States Attorney                           |
| 16 | Dated: August 15, 2025   | /s/ T. Zindel for R. Abendroth                   |
| 17 |  | ROBERT ABENDROTH Assistant U.S. Attorney         |
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## ORDER

Pursuant to the stipulation of the parties and good cause appearing, the sentencing hearing as to defendant Cervantes, now scheduled for August 25, 2025, is continued to Thursday, August 28, 2025, at 9:30 a.m. and the dates for sentencing related filings proposed by the parties are adopted. As to defendant Victor Velasquez, the status conference is continued from August 25, 2025, to August 28, 2025, at 9:30 a.m. and time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) (Local Code T4).

IT IS SO ORDERED.

Dated: **August 15, 2025** 

DALE A. DROZD

UNITED STATES DISTRICT JUDGE